

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI, ARATI KREIBICH,
MICO LUCIDE, JOSEPH MARCHICA, KEVIN
MCMILLAN, ZINOVIA SPEZAKIS, and NEW
JERSEY WORKING FAMILIES ALLIANCE, INC.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in her official
capacity as Monmouth County Clerk, SCOTT M.
COLABELLA, in his official capacity as Ocean
County Clerk, PAULA SOLLAMI COVELLO, in her
official capacity as Mercer County Clerk, JOHN S.
HOGAN, in his official capacity as Bergen County
Clerk, EDWARD P. MCGETTIGAN, in his official
capacity as Atlantic County Clerk, and E. JUNIOR
MALDONADO, in his official capacity as Hudson
County Clerk,

Defendants.

Case No. 3:20-cv-08267-
FLW-TJB

Civil Action

**NOTICE OF MOTION
TO DISMISS
PURSUANT TO
FED. R. CIV. P.
12(b)(6)**

TO: Yael Bromberg, Esq.
Brett M. Pugach, Esq.
Bromberg Law, LLC
73 Glen Avenue
P.O. Box 1131
Glen Rock, New Jersey 07452
Attorney for Plaintiffs

COUNSEL:

PLEASE TAKE NOTICE that on a date to be set by the Court, the undersigned, counsel for defendant, Paula Sollami-Covello (“Defendant”), will

move before the Honorable Freda L. Wolfson, U.S.D.J., at the U.S. District Court for the District of New Jersey, 402 East State Street Room 2020, Trenton, NJ 08608, for an Order dismissing Plaintiff's First Amended Complaint pursuant to Fed. R. Civ. Proc. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Brief in Support of Defendant's Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that Defendant requests oral argument if timely opposition is filed.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is submitted herewith.

GENOVA BURNS LLC

*Attorneys for Defendant,
Paula Sollami-Covello*

By: /s/ Angelo J. Genova
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Dated: March 29, 2020

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